

1 STUART G. GROSS (#251019)  
2 sgross@grosskleinlaw.com  
2 **GROSS & KLEIN LLP**  
3 The Embarcadero  
4 Pier 9, Suite 100  
5 San Francisco, CA 94111  
t (415) 671-4628  
f (415) 480-6688

6

7 *Attorneys for Laura Hart*

8

9 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

10 In re  
11 PG&E CORPORATION

12 - and -

13  
14 PACIFIC GAS AND ELECTRIC COMPANY,  
15  
Debtors.

Bankruptcy Case  
Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

16  
17  
18  
19  
**NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL NOTICE  
BY LAURA HART**

20  
21  
22  
23  
24  
25  
26  
27  
28

Affects PG&E Corporation  
 Affects Pacific Gas and Electric  
Company  
 Affects both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

---

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1                   **PLEASE TAKE NOTICE** that Laura Hart (“Hart”) hereby requests, pursuant to Rules  
2 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, or pursuant to any  
3 other applicable rule or statute, that notice of all matters which may come before the Court be  
4 given to Hart’s counsel of record:

5                   **GROSS & KLEIN LLP**  
6                   Stuart G. Gross  
7                   The Embarcadero  
8                   Pier 9, Suite 100  
9                   San Francisco, CA 94111  
10                  Telephone: (415) 671-4628  
11                  Facsimile: (415) 480-6688  
12                  E-mail: sgross@grosskleinlaw.com

13                  The foregoing request includes, without limitation all notices, papers, and disclosure  
14                  statements referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy  
15                  Procedure, and also includes notice of any orders, applications, complaints, demands, hearings,  
16                  motions, petitions, pleadings or requests, and any other documents brought before the Court in  
17                  this case, as well as anything concerning which Hart may be heard under Section 1109 of the  
18                  Bankruptcy Code, whether formal or informal, whether written or oral, and whether transmitted  
19                  or conveyed by electronic mail, mail, hand delivery, telephone, telegraph, facsimile, or otherwise.

20                  This notice of appearance and request for special notice, as well as any subsequent  
21                  appearance, pleading, claim or suit, are without prejudice to and do not waive and expressly  
22                  reserves: (1) Hart’s rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or  
23                  in equity, against the above-captioned debtor and any other person either in this case or in any  
24                  other action; (2) any objection which may be made to the jurisdiction of the Court; (3) Hart’s  
25                  right to have final orders in non-core matters entered only after de novo review by a district  
26                  judge; (4) Hart’s right to trial by jury in any proceedings or trial, in any state or federal court, so  
27                  triable herein or in any case, controversy or proceeding relating hereto; and (5) Hart’s right to  
28                  have and reference withdrawn in any matter subject to mandatory or discretionary withdrawal.  
29                  This notice of appearance and request for special notice, as well as any subsequent appearance,  
30                  pleading, claim or suit, are not, shall not be deemed or construed as, a submission of Hart to the  
31                  jurisdiction of the Court concerning any claim or the waiver of any rights of Hart to pursue any

---

32                  NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1 claims against any person in any other forum, state or federal, including without limitation, the  
2 jurisdiction of the Court to adjudicate non-core matters, all of which rights are reserved without  
3 prejudice.

4

5 Dated: February 20, 2019

GROSS & KLEIN LLP

6

7 By: */s/ Stuart G. Gross*  
STUART G. GROSS

8 *Attorneys for Laura Hart*

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

GROSS & KLEIN LLP  
THE EMBARCADERO  
PIER 9, SUITE 100  
SAN FRANCISCO, CA 94111

---

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089